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October 12, 2022

Via ECF Only

Hon. Katharine H. Parker, U.S.M.J.
U.S. District Courthouse
500 Pearl Street, Room 750
New York, New York 10007

Re: *Graham Chase Robinson v. Robert De Niro et al.*
Civil Action No.: 19cv9156 (LJL) (KHP) (the "Action")

Dear Judge Parker:

This office represents Defendant Robert De Niro, and serves as co-counsel, along with Tarter Krinsky & Drogin LLP, for Defendant Canal Productions, Inc. We write to respectfully request that the Court permit Plaintiff to complete the two hours and 38 minutes remaining for Mr. De Niro's deposition on October 21, for the reasons set forth herein.¹ Subject to Court approval, Plaintiff's counsel consents to completing the deposition on this specific date at an agreed-upon time, provided that no other case deadlines, including the summary judgment briefing schedule set by the Court, are changed.

Mr. De Niro is currently engaged in the casting and preproduction phases for a motion picture being filmed in Cincinnati, Ohio. Mr. De Niro has been cast as the lead in this motion picture, and is also acting as a secondary, distinct character therein. Mr. De Niro only recently realized that his filming for this motion picture could interfere with his October 14 deposition date because the filming for a production he just completed filming was delayed for COVID-related issues. In addition to the foregoing, Mr. De Niro remains involved in a pending divorce/custody proceeding with his ex-wife.

For the foregoing reasons, Defendants respectfully request that the Court allow Plaintiff to complete Mr. De Niro's deposition on October 21, 2022. If this application is granted, no other deadline, including those for summary judgment, will be changed.

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP

/s/ Laurent S. Drogin

**TRAUB LIEBERMAN STRAUS
& SHREWSBERRY LLP**

/s/ Gregory R. Bennett

¹ On September 8, 2022, the Court granted Defendants' application to adjourn the completion of Mr. De Niro's deposition until October 14, 2022 (ECF Doc. #257).